UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
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To: Idaho Leadership Team

From: State Director

Subject: Stubble Height Study Update DD: **11/30/04**

For 15 years we have increased emphasis on the use of stubble height for monitoring livestock use of riparian areas. In certain areas stubble height has been the only monitoring and management tool for regulating livestock use of riparian areas. Because of questions and concerns regarding the use of stubble height, the Forest Service's Intermountain Regional Forester and I asked for a scientific review of the use of stubble height for monitoring and managing riparian areas.

A team of scientists, land management agency specialists, and ranchers, under the auspices of the University of Idaho, reviewed the use of stubble height and other annual indicators of riparian use. This team issued a report that can be obtained at: http://www.cnr.uidaho.edu/range/publications/Stubble_Height_Report.pdf.

We pride ourselves on using the best scientific information available. The scientific evidence we found in the report on stubble height identifies some issues in the way we use this tool that need to be addressed. In particular, the scientists pointed out that the linkages between stubble height and riparian functions have neither been extensively researched nor documented through long-term monitoring. Yet, the report is quick to point out that stubble height is a valuable tool we should continue to use. It can be used as a trigger for taking a management action, e.g., moving livestock from a pasture or modifying a grazing system through the annual use authorizations. The report concludes that it is inappropriate to use stubble height as a performance standard, e.g., using it as the primary basis for taking action against a grazing permit.

We foresee stubble height will still be a valid annual indicator for use in riparian areas. The report recommends using stubble height and other annual indictors (like streambank disturbance and woody species use) as procedural standards as opposed to prescriptive or performance standards. Adaptive management should be implemented when annual use indicators are not met, which could mean a change in season, duration, or intensity of livestock use the following season. Long-term monitoring of riparian plant composition, streambank disturbance, or woody species regeneration would determine if annual indicators are achieving desired results. The

report emphasizes adaptive management and corrective actions where deemed necessary to meet short-term indicators and long-term objectives.

We have organized a joint Bureau of Land Management/Forest Service (BLM/FS) team to develop a strategy on how we will implement the relevant findings and recommendations in this report. Team members are:

John Palmer - Director, Vegetation Management, FS – Intermountain Region
Jon Foster - Chief, Resources & Science, BLM – Idaho State Office
Tom Miles - Rangeland Management Specialist, BLM - Idaho State Office
Carol Benkosky - District Ranger, FS - Salmon-Challis NF
Curt Johnson - Rangeland Ecosystem Program Manager, FS - Intermountain Region
Bruce Fox - Range Program Leader, FS - Northern Region
Warren Ririe - Rangeland Management Specialist, FS - Boise & Sawtooth NFs
Tim Burton - Fisheries Program Leader, BLM – Idaho State Office
Craig Nemeth - Assistant Field Manager, BLM - Salmon Field Office

This team is currently reviewing the report, validating common understanding of findings and recommendations, developing consistency in terminology, developing a web page for informational and source material, determining what can be implemented immediately, and recommending what needs consideration for further work and research. The team is also working with National Oceanographic and Atmospheric Administration-Fisheries and the U.S. Fish and Wildlife Service to explore consultation issues. A communication plan will be prepared along with a list of common questions and answers. The team will report their recommendations to us in January. The team has drafted a description of the procedure for appropriate use of annual monitoring indicators like stubble height. This draft document, "Working with Annual Grazing Use Indicators and Standards," is attached for your review and comment. Please submit comments on the draft to Tom Miles or Tim Burton in the Idaho State Office (931), by Tuesday, November 30, 2004.

The immediate question is what we do right now with National Environmental Policy Act (NEPA) decisions and non-compliance tied to stubble height? Until the Implementation Team has completed its work, we recommend that you not make any changes in current direction. For now, NEPA documents and decisions should be issued as they are currently written. Continue to work with Tom Miles (208-373-3804) and Tim Burton (208-373-3819) on grazing administration issues.

If there are questions or comments about our processes, please contact any of the BLM members of the Implementation Team.

Signed	Authenticated
K Lynn Bennett	Sharon Olendorff
State Director	Executive Assistant (930)

Attachment
1 – Draft Working with Annual Grazing Use Indicators and Standards (3 pp.)

DRAFT
Working with Annual Grazing Use Indicators and Standards
White Paper
September 29, 2004 draft

The University of Idaho Stubble Height Study Report (U of Idaho, 2004) states the opinion that annual indicators of grazing use such as stubble height are generally not appropriate for use as a performance standard. However, many plans, grazing decisions, ESA consultations, etc., have used them as such. These standards, to be properly executed, should follow specific implementation procedures. By doing this, these annual indicators can be effectively used as part of procedural grazing standards that tie the indicators to specific management processes and actions. In fact, this may be more effective in the long run by increasing the focus of grazing actions and decisions to include both the annual management requirements and placing additional emphasis on long-term desired management goals and objectives described in terms of riparian and aquatic resource values and conditions.

The following decision tree and discussion display how standards should be implemented and used with stubble height and other similar indicators or measures of annual grazing use.

Decision Tree

In the decision tree, the land manager and grazing permittee evaluate whether the annual grazing use indicator or standard was met (block 1 – Figure 1).

Annual Indicator Met: If the annual grazing use indicator was met, current management will continue, including short and long-term monitoring.

Long-term monitoring indicators are used to assess whether management objectives for riparian resource conditions and values are being achieved. This data will be used over time to tie the annual indicator or standard to its effectiveness as a management tool for achieving the desired conditions (block 2). This measures the effectiveness of the indicator or standard relative to management goals and objectives.

If the desired condition objective is not being achieved, there is a need to change management and/or modify the value or change the type of annual indicator. Once the desired condition objective is achieved, it may be possible to modify the value or change the type of annual indicator and still maintain the desired condition (block 3).

Annual Indicator Not Met: If grazing use exceeds the established annual indicator or standard, the resource manager, in consultation with the permittee(s) and others, as appropriate, evaluates 1) the potential cause for exceeding the standard, and 2) the grazing use relative to its impact or how it is affecting the achievement of the desired resource conditions (block 4).

An evaluation of the current condition as compared to the desired condition should be made when the annual indicator is not met. If there is a large departure between current conditions and desired resource conditions, it may be fairly obvious that the need to achieve the annual use indicator is significant and that adaptive management actions are needed to provide for the achievement of the annual use indicator. The resource manager defines these actions in

collaboration with the permittee(s) and others, as appropriate. The adaptive actions are implemented through annual operating instructions issued by the resource manager (block 5).

If the resource manager's evaluation concludes that current conditions are close to desired resource conditions, then failure to achieve the annual use indicator during that grazing season may not be significant relative to achieving long-term objectives. No other adaptive management actions may be necessary. Existing management and monitoring to achieve desired conditions would continue (blocks 2 & 3).

If an adaptive action is developed, the resource manager, in collaboration with permittee(s) and others as appropriate, must assess if the adaptive actions were implemented as designed during the following grazing period (block 5). They must also determine if they were effective in achieving the annual use indicators (block 1). If they were effective, management and monitoring would continue as planned (blocks 2 & 3). If they were not effective, then the resource manager, in collaboration with permittee(s) and others as appropriate, must determine what additional adaptive management actions are needed (return to block 5).

If the adaptive actions were not implemented, the resource manager would determine if the failure results from a design problem or changed condition, outside the control of the permittee(s) (block 6). If there were problems with the design or ability to implement the adaptive action, the resource manager, in collaboration with permittee(s) and others as appropriate, would revisit the design or selection of the adaptive action (return to block 5). If failure to implement the adaptive action is not related to the design or ability to implement the adaptive action, the resource manager would then need to decide whether a permit noncompliance issue exists that must be addressed (block 7). If a noncompliance action were warranted, the resource manager would implement the appropriate action or process for dealing with the noncompliance issue (block 8). If the resource manager determines that a noncompliance action is not warranted, additional changes or adaptive management direction should be considered (return to block 5).

Implementation of Annual Grazing Standards or Indicator Thresholds (such as Stubble Height)

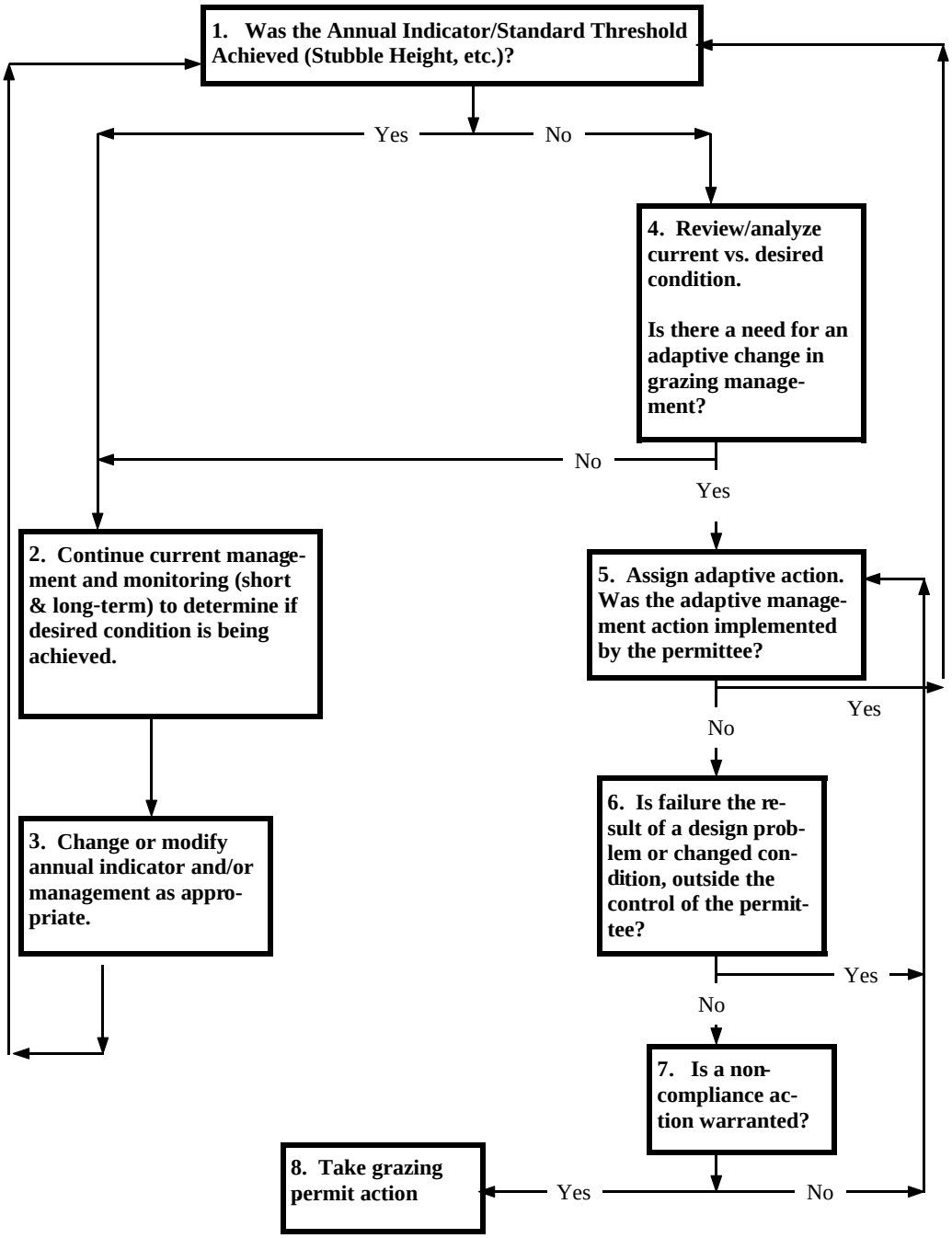

Figure 1. Flow diagram describing the process for making decisions related to livestock grazing in riparian areas.